



P.O. Box 88 □ 141 South Main St. □ Beacon Falls, CT 06403

Tel: 1-203-723-6697
Elsewhere: 1-800-DIAL GIFT

December 1, 1995

William S. Caton
Acting Secretary
Federal Communications Commission
1919 M Street N.W. - Room 222
Washington, D.C. 20554

Re: CC Docket 95-155, Toll Free Access Codes

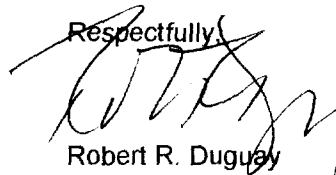
Dear Mr. Caton:

I am attaching to this letter my original submission dated November 13, 1995 and a portion of the UPS 2nd Day Air envelope which is proof of their (i.e. UPS) inability to deliver my submission. I simply don't know they were unable to deliver the submission, it was addressed as above with the additional notation of your mail stop.

Inspite of the fact that my submission is late, I ask that you please accept it. I do note that it was originally scheduled to be delivered on the first day of the government shutdown.

Thank you for your consideration. Since I have now lost faith in UPS, I have decided to post this letter and my submission with the good ol' USPS, they deliver for me (or let's hope so!!)

Respectfully,


Robert R. Duguay
President

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November 13, 1995

William F. Caton
Acting Secretary
Federal Communications Commission
Mail Stop 1170
1919 M Street, N.W., Room #222
Washington, D.C. 20554

Re: FCC Toll Free Service Access Codes
CC Docket No. 95-155

Dear Sir:

I am writing to you to express my concern that I may be unable to replicate my company's toll free number with my RespOrg once the new 888 toll free service becomes operative next spring, as is currently proposed.

What follows is said with a great deal of tongue-in-cheek, but I will gladly support any of the petitions of all of the RespOrg's regarding the CC Docket No. 95-155 if only the FCC will assign my company the following two 888 numbers:

- 1/ 1-888-225-5288
- 2/ 1-888-265-5328

Since I'm 100% sure that neither AT&T nor MCI (nor any other RespOrg) will state to the FCC that any 800 number is more or less important than any other number, they could not possibly object to this compromise. Afterall, these are only two numbers out of some ten million 888 toll free numbers that will soon be available, a mere pittance. To save you time I'll translate for you: 888-225-5288 is 888-CALL ATT and 888-265-5328 is 888-COLLECT.

While I spoke tongue-in-cheek above, I'll assure you that I was not being sarcastic since this subject is very important to me. I own a very small mail order company (we have no retail store). Our business depends entirely on the telephone network, and primarily on our 800 toll free number, for 100% of our business. We spend the limited amount of marketing dollars we have to remind our customers to call 1-800-DIAL GIFT. It works! Many very large companies, as you know, spend literally millions of advertising dollars to instill their toll free numbers in the minds of their customers and potential customers. It is these companies and their

William F. Caton
Federal Communications Commission
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advertising dollars and their payment of their monthly phone bills over many years that have, in effect, made the 800 number industry what it is today. Apparently, without exception, the RespOrgs that provide toll free 800 service have petitioned the FCC to prevent companies such as my own from replicating their toll free numbers once 888 service is in place. This is wrong.

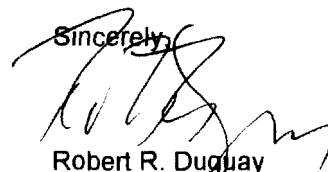
I fear that the RespOrgs that provide toll free service will hold both large and small companies for ransom if they control the assignment of 888 numbers. I know already of instances of this kind of behavior within the current system and will gladly provide the commission with specific examples, if you wish.

Furthermore, from the point of consumers, much confusion may result if different companies own the identical 800 and 888 numbers. Presently and daily, I receive calls for 800-DICKIES, 800 DIAL-A-GIFT, for an insurance company located in Denver, CO, and for a company that apparently sporadically spot markets vitamins and health foods in various television markets around the country. From my point of view this is both irritating and expensive. This problem will only exacerbate if companies such as my own are unable to protect our investment (not any RespOrg's investment) in our toll free number.

I view my company's investment in our toll free number as being no different in kind than the use of and investment in developing and promoting any of the broad band spectrums regulated and administered by the FCC (e.g. radio or television airwaves, satellite or mobile phone networks, etc.). Our revenues pale beside all of the RespOrgs that are petitioning your commission, but they are mine and important to me. The fact is that the FCC should recognize the reality that many companies have made sizeable financial investments in their 800 numbers and that investment should be protected by government regulation.

I know that many sensible suggestions have been made to the FCC about how the interests and rights of current holders/users of 800 numbers could be satisfied while encouraging the use of the new series of 888 toll free numbers. With so many numbers available under the 888 series, I can't imagine even 2% of current owners of 800 numbers wanting to replicate them as 888 numbers. I strongly urge that the FCC protect the interests of both small and large companies that have vested interests, for whatever reasons, in their current toll free numbers by allowing them to be replicated in the 888 series.

Sincerely,


Robert R. Duguay
President

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